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February 8, 2017

VIA ECF

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

RE: C.G.B., Plaintiff, v. AIDA SANTA LUCIA, VAROUJAN KHOROZIAN, KYLE KHOROZIAN, DEREK KHOROZIAN and JOHN DOES 1-5 (being agents, servants and employees of the above as a continuing investigation may reveal who are fictitiously named because their true identities are unknown), Defendants.

United States District Court
District of New Jersey
Civil Action No.: 2:15-cv-03401 (SDW-LDW)

Dear Judge Wettre:

Kindly accept this letter in response to the letter from Victoria Airgood, Esq., counsel for defendants Varoujan Khorozian, Kyle Khorozian and the Estate of Derek Khorozian, dated February 7, 2017. In Ms. Airgood's letter, she requests that the Administrative Termination deadline be extended for thirty (30) days due to her clients' "need for additional time to address the settlement terms and motion to seal."

As Your Honor may recall, the parties appeared in Court on December 9, 2016. The Khorozian defendants were present in the courtroom. The terms of the settlement agreement were placed on the record and acknowledged by the Khorozian defendants. Varoujan Khorozian acknowledged the settlement terms on behalf of the Estate of Derek Khorozian. All parties agreed that the settlement could be consummated in sixty (60) days

and, in fact, defendants' counsel represented that it could likely be consummated much sooner. Accordingly, it is unclear why the Khorozian defendants need an additional thirty (30) day to "address" settlement terms that they consented to on the record almost two (2) months ago. Further, the Khorozian defendants and their counsel acknowledged that the settlement agreement was not contingent in any way on either the filing or disposition of any "motion to seal" the record in this matter.

Plaintiff has executed the Confidential Settlement Agreement and General Release and forwarded a copy to defendants' counsel. Accordingly, plaintiff has fully performed all of her obligations. Plaintiff would agree to a reasonable extension of the Administrative Termination deadline but given the circumstances where the defendants need only sign the already agreed upon Settlement Agreement, thirty (30) days seems excessive.

Thank you.

Respectfully submitted,

s/ Donald F. Burke Jr.

Donald F. Burke Jr., Esquire

cc: Victoria Airgood, Esq., HILL WALLACK, LLP, VIA ECF
Linton Turner, Esq., MAYFIELD, TURNER, O'MARA & DONNELLY P.C., VIA ECF